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IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

GOLDSTEIN FAMILY PARTNERSHIP,

LP, as nominee and agent for several

Plaintiff,

lenders,

: Civil Action No.: 1:17-CV-08964-GHW

Honorable Gregory H. Woods

ECF Case

v.

Q LOTUS, INC., Q LOTUS HOLDINGS INC., GARY A. ROSENBERG TRUST,

UNDER THE WILL OF BEN J.

ROSENBERG DATED AUGUST 28, 1978.

Defendants.

:

:

ORDER TO SHOW CAUSE FOR ENTRY OF DEFAULT FINAL JUDGMENT

PLEASE TAKE NOTICE that upon the annexed Affidavit of David D. Holahan, Esq., sworn to February 22, 2018, the exhibits attached thereto, and the Memorandum of Law submitted herewith, Plaintiff Goldstein Family Partnership LP, as nominee and agent for several lenders, will move this Court before the Honorable Gregory H. Woods on the Court before the Honorable Gregory H. Woods on Lotus Inc., Q Lotus Holdings, Inc. and the Gary A. Rosenberg Trust, under the Will of Ben J. Rosenberg dated August 28,1978 granting:

- a) a declaration that Plaintiff is entitled to all sums owed under the Promissory Note (as amended, supplemented, restated, and extended), and the guarantees of the same;
- b) money recovery against Q Lotus, Inc. and Q Lotus Holdings in an amount not less than \$10,011,677.30, with additional interest to be calculated on the date the judgment is entered;

c) money recovery against the Gary A. Rosenberg Trust, under the Will of Ben J. Rosenberg dated August 28,1978 for \$350,000.00; and

d) for such other and further relief that this court deems just and proper.

OTERERED that this order beserved on each of the deterdants no later than March 2, 2018; and FURTHER ORDERED that and opposition be Filed no later than March 15, 2018, and that any reply February 22, 2018 New York, New York

David D. Holahan

Tannenbaum Helpern Syracuse &

Hirschtritt, LLP 900 Third Avenue

New York, New York 10022

Tel: (212) 508-6719

Email: holahan@thsh.com Attorneys for Plaintiff Goldstein Family Partnership, LP, as nominee

and agent for several lenders

Dated: February 23, 2018 New York, New York

SO ORDERED: